

IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ZURICH AMERICAN INSURANCE
COMPANY, as successor by merger to
MARYLAND CASUALTY
COMPANY,

Plaintiff,

CARLY RAY INDUSTRIES, INC.,
KEENAN MAYS and JAMARK
DERAY GOODWIN,

Defendants.

CIVIL ACTION NO.
1:19-cv-01348-MHC

PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT
AND MOTION FOR DEFAULT JUDGMENT

COMES NOW Plaintiff Zurich American Insurance Company, as successor by merger to Maryland Casualty Company, (“ZAIC”) and hereby respectfully moves this Court for summary judgment and default judgment pursuant to Fed. R. Civ. P. 55 and 56. In support of this motion, ZAIC relies on the following:

- ZAIC’s Brief in Support of its Motion for Summary Judgment and Motion for Default Judgment.
- ZAIC’s Statement of Material Facts as to Which There is No Genuine Issue

to be Tried.

- ZAIC's Appendix of Exhibits in Support of Its Motion for Summary Judgment and Motion for Default Judgment.

In its Brief in Support of its Motion for Summary Judgment and Motion for Default Judgment, ZAIC shows the Court that there are no genuine issues of material fact and that ZAIC is entitled to summary judgment and default judgment as a matter of law that it has no duty to defend or indemnify Defendants Carly Ray Industries, Inc. and Jemark Deray Goodwin in connection with any demands, claims, or suits filed or asserted by Defendant Keenan Mays in the underlying litigation. Wherefore, ZAIC respectfully requests that the Court grant its motion for summary judgment and motion for default judgment.

Respectfully submitted this 25th day of March, 2020.

**LEWIS BRISBOIS BISGAARD
& SMITH LLP**
1180 Peachtree Street, NE
Suite 2900
Atlanta, Georgia 30309
404.348.8585 (Telephone)
404.467.8845 (Facsimile)
seth.friedman@lewisbrisbois.com
christopher.meeks@lewisbrisbois.com
victoria.munian@lewisbrisbois.com

/s/ Christopher C. Meeks
Seth M. Friedman
Georgia Bar No. 141501
Christopher C. Meeks
Georgia Bar Number 371020
Victoria E. Munian
Georgia Bar No. 463486
*Attorneys for Plaintiff Zurich
American Insurance Company as
successor by merger to Maryland
Casualty Company*

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CERTIFICATE OF COMPLIANCE

Counsel certifies that this filing is prepared with Time New Roman 14-point font in compliance with Local Rule 5.1.

Dated this 25th day of March, 2020.

**LEWIS BRISBOIS BISGAARD
& SMITH LLP**

1180 Peachtree Street, NE
Suite 2900
Atlanta, Georgia 30309
404.348.8585 (Telephone)
404.467.8845 (Facsimile)
seth.friedman@lewisbrisbois.com

/s/ Christopher C. Meeks

Seth M. Friedman
Georgia Bar No. 141501
Christopher C. Meeks
Georgia Bar Number 371020
Victoria E. Munian
Georgia Bar No. 463486
*Attorneys for Plaintiff Zurich
American Insurance Company as*

christopher.meeks@lewisbrisbois.com
victoria.munian@lewisbrisbois.com

*successor by merger to Maryland
Casualty Company*